

State Ethics Commission

ANNUAL REPORT 1991



STATE OF MARYLAND
EXECUTIVE DEPARTMENT

WILLIAM DONALD SCHAEFER
GOVERNOR



STATE ETHICS COMMISSION

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STATE ETHICS COMMISSION

THIRTEENTH ANNUAL REPORT

January 1, 1991 - December 31, 1991

STATE ETHICS COMMISSION

Thirteenth Annual Report

January 1, 1991 - December 31, 1991

GENERAL STATUTORY IMPLEMENTATION

The State Ethics Commission met 10 times during Calendar Year 1991. During the year the Commission was involved in program activity relating to all areas of its statutory mandate. These include financial disclosure, conflict of interest, lobbyist disclosure and restrictions, local government ethics laws, school board ethics regulations, advisory opinions, enforcement matters, employee education, and public information activities. Substantial activity was directed at implementing the provisions of HB 1049, which restricted campaign financing activities relating to General Assembly members and candidates for the General Assembly by registered lobbyists. The Commission and the staff also worked closely with the University of Maryland in developing faculty conflict of interest policies and procedures as required by 1990 amendments to the Ethics Law. The Commission and its staff were also involved in modifying programs due to reduced operational fiscal support caused by declining State revenues. Commission regulations were also reviewed during 1991 with adjustments being made where appropriate. It is expected that the regulations review process will be completed in 1992.

Issuance of Advisory Opinions

The Commission issues advisory opinions in response to requests from officials, employees, lobbyists, and others who are subject to the Law. Additionally, the Commission may issue advisory opinions to other persons at its discretion. During Calendar Year 1991, the Commission issued 15 formal published opinions. Most of the opinions issued primarily dealt with the employment or ownership interest prohibitions under §3-103(a) of the Ethics Law. Two opinions focused on post-employment issues. Two opinions dealt, in part, with service on private boards. One opinion discussed participation in a State program by State officials and employees. One opinion advised a new employee about how to handle employment and interest holdings in making the transition to State employment. Commission opinions are initially published in the Maryland Register and are compiled and published in Title 19A of the Code of Maryland Regulations. In 1991, the Commission completely revised its advisory opinion index in cooperation with the Division of State Documents. The index was simplified and made shorter as a result of the process. One factor reducing the number of formal opinion requests and opinions issued by the Commission is the large number of existing opinions that can now be used for fast informal guidance. The Commission staff was able to provide informal guidance in about 575 potential formal request situations based on existing opinions of the Commission. The Commission itself provided informal advice in lieu of formal opinion guidance, usually in the form of a letter in 63 situations during the year.

Financial Disclosure

The administration of the financial disclosure program continued to involve the identification of those required to file, providing technical assistance to filers, and monitoring compliance with the Law. During calendar year 1991, computerization of the filing management part of this program was begun. Compliance review of forms is conducted as part of a phased program for review of the forms of all officials and employees. Currently there are over 7,000 persons filing financial disclosure forms and this number continues to grow significantly. In addition, copies of all judicial official financial disclosure forms are also filed at the Commission office. As part of the review program, letters are sent to filers regarding the need to provide further information in order to meet filing requirements.

In addition to the regular financial disclosure program, a substantial number of gubernatorial appointees to boards or commissions seeking limited conflict of interest exemptions from the appointing authority and from the Senate where confirmation is required, must file a form disclosing areas of existing conflicts with the Commission. The Commission staff coordinated the filing of these forms with the appointing authority and discussed the filing requirements with a large number of appointees throughout the year.

Lobbyist Disclosure and Regulation

A major activity during the second half of 1991 was to develop guidelines to assist lobbyists to comply with HB 1049, which limits lobbyist campaign finance activity regarding members of the General Assembly and candidates to be members of the General Assembly. The Law generally prohibits solicitation and transmittal of contributions. It also prohibits being involved in political committees making contributions to these persons. The Commission and the staff developed informal advice which was distributed to lobbyists by memo and updated several times during the year.

During the lobbying year which ended on October 31, 1991, 1008 lobbying registrations were filed with the Commission. This represents an increase from the 911 registrations filed in 1990 and the 844 filed in 1989. The 1008 registrations were filed by 498 different lobbyists on behalf of 661 separate employers. (Some employers have more than one lobbyist and many lobbyists have more than one employer.) This compares to 660 employers having one or more registrants in the previous year. The number of lobbyists and registrations increased significantly during 1991, but the number of employers remained essentially the same. Although the largest number of lobbyists are registered during the legislative session, registrations are beginning and ending throughout the lobbying year, which begins on November 1 and ends on October 31 of the following year. Most persons registered to lobby have a single registration representing one employer, however, 69 lobbyists had two or more registrations during this time period, 40 registrants had four or more employers, and 26 lobbyists had eight or more employers.

The \$12,854,879 in lobbying expenditures reported for the period of October 31, 1991, represents an increase of \$1,707,437 over the previous year. Lobbying expenditures have significantly increased since the Commission reported \$2,864,454 of expenditures in 1979, the first year the Ethics Commission administered the filing program. An analysis of individual reports indicates that 60 lobbyist employers reported having total lobbying expenditures of \$50,000 or more. There were 151 lobbyist employers reporting total expenditures of \$25,000 or more. Reports of individual lobbyists registered

on behalf of one or more employers indicate that 34 of these persons reported \$50,000 or more in compensation for services. Nineteen lobbyists reported compensation of \$100,000 or more. Examples of topic areas involving large total employer expenditures during the reporting period included health, utilities, insurance, banking, business, labor, attorneys, construction, lottery, horse racing, and cable television. A list of those employers expending \$25,000 or more and those lobbyists reporting \$50,000 or more in compensation is included in the appendices of this report.

The following expenditure data summarizes lobbying expenditures for the last three lobbying years:

	<u>10/31/89</u>	<u>10/31/90</u>	<u>10/31/91</u>
1. Expenditures for meals and beverages for officials or employees or their immediate families.	\$ 395,883	\$ 393,927	\$ 416,924
2. Expenditures for special events, including parties, dinners, athletic events, entertainment, and other functions to which all members of the General Assembly, either house thereof, or any standing committee thereof were invited. (Date, location, group benefitted, and total expense for each event are also reported.)	\$ 242,871	\$ 229,030	\$ 310,793
3. Expenses for food, lodging, and scheduled entertainment of officials and employees and spouses for a meeting given in return for participation in a panel or speaking engagement at the meeting.	\$ 5,941	\$ 9,020	\$ 14,988
*4. Expenditures for gifts to or for officials or employees or their immediate families (not including sums reported in 1, 2, and 3).	\$ 150,618	\$ 166,299	\$ 146,313
<u>Subtotal of items 1, 2, 3, & 4</u>	<u>\$ 795,313</u>	<u>\$ 798,276</u>	<u>\$ 889,018</u>

* This category includes the value of race track passes distributed by racing industry lobbyists to State officials. \$105,950 of the \$146,313 reported for gifts in the period ending 10/31/91 reflects the value of these passes.

5. Total compensation paid to registrant (not including sums reported in any other section).	\$7,804,713	\$8,666,614	\$9,719,863
6. Salaries, compensation and reimbursed expenses for staff of the registrant.	\$ 646,481	\$ 635,346	\$ 713,264
7. Office expenses not reported in items 5 and 6.	\$ 680,135	\$ 442,954	\$ 711,353
8. Cost of professional and technical research and assistance not reported in items 5 and 6.	\$ 216,696	\$ 189,672	\$ 273,779
9. Cost of publications which expressly encourage persons to communicate with officials or employees.	\$ 290,060	\$ 216,926	\$ 304,533
10. Fees and expenses paid to witnesses.	\$ 10,172	\$ 10,619	\$ 4,850
11. Other expenses.	\$ 190,875	\$ 209,035	\$ 238,219
<u>Total of items 1 through 11</u>	<u>\$10,634,445</u>	<u>\$11,147,442</u>	<u>\$12,854,879</u>

Enforcement Activities

The Ethics Law and implementing rules of the Commission provide that any person may file a complaint with the Commission. Complaints filed with the Commission must be signed, under oath, and allege a violation of the Law by a person subject to the Law. Additionally, the Commission may file a complaint on its own initiative, and it carries out preliminary inquiries of potential law violations at its discretion.

In Calendar Year 1991 the Commission issued or accepted 47 complaints. Forty-two complaints involved financial disclosure matters, 3 complaints involved lobbyist matters, and 2 complaints related to conflict of interest issues. Also, during this year action was completed on 48 complaints. Thirty-eight of these completed complaint cases were financial disclosure matters and 4 were lobbyist matters. Twenty-two complaints were still active at the end of the Calendar Year. Thirty-three failure to file timely financial disclosure complaints were terminated by accepting late filing as a cure. Four late financial disclosure filing cases were completed by submission of the form, an admission of late filing violations, waiver of confidentiality, acceptance of a reprimand, and the payment of funds to the State. Nine hundred and fifty dollars was collected as a result of this process. The Ethics Law

provides for the possibility of late fees or court imposed fines in late filing situations in some circumstances.

In calendar year 1991, the Commission considered several situations involving lobbyists who have failed to timely file either a registration or lobbying activity report. These matters resulted in lobbyists paying the fees in the amount of \$250 as allowed by the Ethics Law. The Commission received a total of \$1,500 in payments to the State of Maryland representing late fees from lobbyists.

A total of 6 conflict of interest complaints were resolved during calendar year 1991. One was resolved by a cure agreement. Two were resolved by settlement agreements which included admissions of conduct of inconsistent with the Ethics Law and a reprimand. Two matters were settled by agreements which included admissions of violation, reprimand, and payments to the State in lieu of potential civil fines. The final conflict of interest matter was resolved by a disposition agreement where the respondent agreed to certain prior review of his future activities and a payment to the State of Maryland in lieu of potential fines. A total of \$7,500 was received by the State as a result of agreements in these matters. At the end of calendar year 1991, 2 complaints were pending involving conflict of interest.

Local Government Ethics Laws

Maryland counties and cities are required under Title 6 of the Ethics Law to enact local laws similar to the State Law. Criteria for evaluating similarity to the State Law are defined in Commission regulations. Municipalities, based on size and other factors, may be exempted from all or part of the requirement, though an exemption may be granted only in response to a written request. Part of the Commission's regulatory review activity during 1991 included refining its exemption monitoring and review program which is generally designed for a structured review of municipal exemptions after each census.

In addition to the requirement that counties and cities enact ethics laws, the 1983 Session of the General Assembly amended the Law to require local school boards either to promulgate ethics regulations similar to the State Law or be covered by county ethics laws. Technical adjustments to these regulations were developed in 1991 as part of an overall regulations review process. In 1991, the Commission reviewed amendments to local government ethics laws and regulations in five jurisdictions. Most of the staff activity relating to local ethics programs during 1991 involved providing technical assistance to local ethics officials regarding ongoing administration of local government ethics programs. One significant local government activity in 1991 was the holding of a one day ethics seminar for county, city, and school board ethics agencies. The seminar was attended by 85 people and was planned in cooperation with the Maryland Association of Counties, Maryland Municipal League, and the Maryland Association of Boards of Education.

Educational and Informational Activities

The Commission staff has been active in providing information to those covered by the Ethics Law, as well as other persons interested in its requirements. A substantial daily staff workload has involved advising employees, officials, candidates and lobbyists on how to complete forms, and providing

informal advice regarding possible conflicts of interest. The Commission staff has also assisted local government and school board officials in drafting their ethics laws and regulations. The staff has also provided technical advice to many local government ethics boards. Presentations were made by the staff to various groups covered by the Law or interested in the operation of the Law.

The annual briefing for lobbyists and those interested in the operations of the lobbying law was held in Annapolis during the 1991 Session of the General Assembly. The Commission has continued to maintain an office in Annapolis during the legislative session in order to provide assistance in the completion of lobbying or financial disclosure forms. A special briefing was made to lobbyists in the Fall of 1991 primarily covering the specific restrictions regarding campaign fundraising contained in HB 1049. The Commission also has a special pamphlet describing the requirements of the lobbying Law.

Part of the Commission's public information activity involves distribution of lists of registered lobbyists and provision of assistance to persons inspecting various forms filed with the Commission. Pamphlets describing the Ethics Law have been made available to management level employees in State agencies. Another pamphlet covering ethics requirements for part-time members of State boards and commissions is also being distributed on a limited basis. The Commission had also initiated an Ethics Bulletin which covered prohibitions, rules, procedures and Commission decisions along with a special bulletin sent to lobbyists when changes are made in that program. These two bulletins have been suspended due to fiscal limitations. Fiscal limitations in 1991 have essentially eliminated the ability to develop printed materials and distribute mailed items relating to this part of the Commission program.

LEGISLATIVE RECOMMENDATIONS AND ISSUES

In 1991, the General Assembly passed one bill that related to legislative recommendations of the Commission. This bill related to a need to strengthen the post-employment provisions of the Ethics Law. This bill as passed was vetoed by the Governor because he believed that it had impacts on activities that were beyond what was needed and had not caused problems in the past.

The Commission continues to review the adequacy of the Public Ethics Law as required by the statute. The five recommendations listed below were specifically suggested by the Commission as issues that would be appropriately addressed by legislation in 1992.

1. Court Authority - Ethics Law Enforcement

The State Ethics Law provides for a variety of remedies in situations where the Ethics Commission has determined that a violation of the Law has occurred. One of these remedies includes a provision in Article 40A, §7-101(1) allowing a court to void an official action taken by an official or employee with a prohibited conflict when the action arose from or concerned the subject matter of the conflict if the legal action was brought within 90 days of the occurrence of the official action, and if the court deems voiding the action to be in the best interest of the public. In the case of Sugarloaf Citizens Association vs. Michael Gudis, the Maryland Court of Appeals ruled that a somewhat similar provision in Montgomery County Ethics Law to be unconstitutional. The main basis for this decision is the court concluded that the Law attempted to vest in the court a non-judicial power. Although it is not completely clear that the decision would apply to void the section of the State Law, the Commission

believes this section should be revised to include clearer guidelines to avoid the court's objections in the Gudis decision.

2. Financial Disclosure - Attribution of Blind Trust

The State Ethics Law contains two major prohibitions which impact on the ownership interests of officials and employees. The first prohibition, which is contained in Article 40A, §3-101, prohibits an official or employee from participating in any matter in which he has an interest. The main form of ownership interest impacted by §3-101 is holding stock in corporations. The second interest prohibition, contained in Article 40A is §3-103(a), prohibits the holding of interests in certain situations where the entity does business with or is regulated by the employee's or official's agency or an affiliated agency. Both of these sections have exception authority that can be exercised by the State Ethics Commission. This authority has been exercised under §3-103(a) by regulations to some extent and under §3-101 by opinion in one instance as to a non-interest restriction. Generally, issues arise under the two sections in a variety of stock ownership circumstances. Some officials have only a few very small holdings, others have a large holding in one or two companies that may relate to their State position. Others have very substantial holdings in a broad range of companies which could result in economic hardship if sale of these assets were required, depending on the facts at the particular time.

The Commission believes that a blind trust program, similar to an existing federal program, could be implemented to apply to the broad stock holding situation. The Commission has established diversified blind trust regulations which would eliminate the application of §3-101 and §3-103(a) to blind trusts established and approved under Commission regulations. These regulations are similar to the federal requirements for these types of trusts. In order to implement these regulations and make the trust truly blind, legislation would be needed to provide that the holdings in approved blind trusts would not have to be included in the annual financial disclosure statements.

The Commission believes a structured blind trust program will accomplish the purposes of the Ethics Law while allowing the State to attract persons to State service who may not otherwise be available or who might be subject to financial hardship in the sales of their holdings. Additionally, this system will provide officials and employees a mechanism that would be available under tightly controlled circumstances to avoid conflicts which might arise unexpectedly regarding their holdings, causing unintended violations of the Law or rendering them unable to act on public business.

3. Lobbyist Gift Disclosure

Under the current requirements of the State Ethics Law, lobbyists are required to disclose compensation, expenses, and gifts. Gift disclosure detail varies according to the nature of the gift and its value. Although there can be differing views about the adequacy of the current disclosure, the Commission believes that there is a significant loophole in the Law relating to the cumulative value of smaller gifts or the use of proration among clients to avoid disclosure of gifts. This occurs as a result of section 5-105(a)(3) of the Law, which allows gifts totalling less than \$15 per day not to count toward a \$75 disclosure requirement as to recipient. More importantly, where a lobbyist has more than one client, the costs of gifts can usually be divided by a number of clients thus never reaching the threshold for disclosure as to person. It is proposed that where a lobbyist makes or is involved in making gifts totalling \$750 to one person from one or more donors during a six month reporting period that this be disclosed. The proposal would provide more realistic disclosure and create a more equitable set of

disclosure rules. Under the current Law, lobbyists having more than one employer can avoid disclosure of gifts while those with only one employer must disclose larger or frequent gifts because proration of expenses is not available.

4. Post Employment Limitations

The current Public Ethics Law regarding post-employment activities contains very technical language requiring close analysis to determine its application. Although the Law's intent is to protect the public interest, standing alone it has weaknesses in providing clear guidance and in enforcement cases. This is particularly true in evaluating the contact of higher level employees with primarily management responsibilities. The proposed legislation would supplement the current Law and would not apply to legislators or part-time board and commission members who are defined as officials under the Law. This approach would not generally prevent private employment or contacts with the official's former agency. It would prohibit participation for compensation in post-employment matters for one year if the matter was in existence and part of the official's responsibility during the person's last 12 months of State service. It is recommended that the legislation contain exception authority and that the scope of the bill be limited to matters involving grants, procurement, regulatory authority, and tax liability. Subsequent governmental employment would not be covered by this legislation.

5. Financial Disclosure - Interest in Corporations

The existing Ethics Law requires the disclosure of corporate interests and the details regarding all corporate interests acquired or transferred during a reporting period. The requirement to report even minor changes is the subject of concern and errors by filers, particularly as it relates to changes typically caused by dividends or dividend reinvestment plans. It is proposed that minor dividend-related transactions less than \$500 not be required to be disclosed in detail. The requirement that the total number of shares held at the end of the year and for larger transactions to be reported in detail would not be impacted by this proposal.

Other Legislative Recommendations

The recommendations listed below were made in previous Ethics Commission annual reports. The Commission continues to believe that these recommendations are appropriate, based on its experience in administering the ethics program:

- The Law should prohibit participation in matters involving adult children of the official or employee.
- The Law should be formally amended to more specifically reflect advice by the Commission and the Attorney General regarding testimonial fund raising by employees and officials, which is fully covered by the Ethics and Elections Law.
- There is a need to consider clearly adding former officials and employees to the persons prohibited from using confidential information under §3-107 of the Law.
- There is a need to consider granting the Commission at least minimal fining authority in conflict of interest matters in order to reduce delay and expensive court proceedings.

- Section 7-101 of the Law should be revised to make it clear that any fine levied by a court will be paid to the State of Maryland.

- The current Law does not seem to clearly deal with gifts from foreign governments. There is a need to review the issue and clarify the Law.

- The Ethics Law prohibits certain types of representation before State agencies. However, except for legislative disclosure under §3-102 of the Ethics Law, there is no specific required disclosure of representation before State agencies. It is recommended that officials who appear before State agencies for compensation include on their annual disclosure form at a minimum the identity of any agencies involved in this compensated representation.

- The provisions covering school board ethics regulations need to be strengthened to assure that there are adequate sanctions for violations by board members, candidates for board membership and lobbyists.

- The Ethics Law prohibits employees and non-elected officials from intentionally using their prestige of office for their own private gain or that of another. Elected officials, however, are not covered by this provision. The existing Law should be amended to include elected officials or a new provision covering these officials dealing with clear cases of abuse should be specifically added to the Law.

- Issues regarding the spouses of employees or officials have arisen in Maryland and on a national basis. The Maryland Public Ethics Law does not consistently and clearly address these issues or provide sufficient policy guidance in these matters. Spouse ethics issues have become more prevalent in part as a reflection of both spouses having careers and other economic relationships. For example, the Law does not clearly deal with the acceptability of gifts to spouses of officials or employees by prohibited donors. Additionally, the financial disclosure provisions do not clearly address gifts received by the spouse to be disclosed by the employee or official even where such gifts are from donors normally requiring official disclosure. Another significant area needing further clarification is under what circumstances is the ownership interest of a spouse to be attributed to the official or employee for conflict of interest purposes under §3-103(a) of the Ethics Law.

- The Commission receives many questions from agencies and others concerning issues involving State related foundations. Some of these questions related clearly to the Ethics Law and can be resolved by the Commission. Many of these questions involve fiscal and general policy issues unrelated or only indirectly related to the Ethics Law. It is not possible for the Commission to determine appropriate policy in these areas. Any control mechanisms that need to be established to reach these concerns should be established by the Executive and Legislative branches of government as part of ongoing policy development.

- The criteria for financial disclosure by executive and legislative branch officials utilize qualitative considerations in addition to salary. The financial disclosure standards for judicial branch employees utilize only a salary standard. As a result of this standard, certain judicial personnel, such as court reporters, are included in the filing requirements. The Commission believes the judicial financial disclosure standards should be amended to include qualitative criteria in addition to salary.

- Consideration should be given to having new officials file a financial disclosure statement covering their holdings as of the time when they come into their position rather than for the previous calendar year.

- The need for disclosure of interests in mutual funds should be reviewed to determine if this information is fully necessary to accomplish the purposes of the Law.

- The provisions of §4-104(c) regarding attributable interests should be modified to reduce the burden caused by the disclosure requirements when a person has a small share in a large diverse testamentary trust.

- Judicial candidates should be required to file financial disclosure in each year of their candidacy in the same way as other State officials.

- In election years improperly filed candidate's disclosure forms create unique enforcement problems. Before a violation can be found and made public a variety of confidential administrative and adjudicatory processes have to occur. In most cases this process would extend well beyond the primary election and probably beyond the general election. This means that serious completion problems or even false disclosure could exist unknown to the voting public. A very large percentage of non-incumbent candidates have substantial financial disclosure statement completion problems. A review should be made by the Executive and the General Assembly to determine whether confidentiality should be eliminated for candidate's financial disclosure enforcement cases at an earlier point in the enforcement process.

- Some consideration should be given to removing the current language dealing with Commission review of forms in §2-103(e), and substituting a provision for review consistent with standards to be established by the Commission.

- In order to avoid uncertain and confusing application and administration of the Law, the special provisions of §6-202 making members of State boards funded in whole or in part by Baltimore County subject to the county disclosure law instead of the State Law should be considered for elimination, or at a minimum copies of these forms should be filed with the State Ethics Commission.

- The bi-county agency ethics regulations requirements should be reviewed to make sure that sufficient penalty provisions are provided and that the current ethics regulations of the agencies meet the intent of the Law.

- The Commission has informally determined that the bi-county agencies are to be treated as State or local agencies for the purposes of exemptions under the State lobbying registration requirements. The Law should be amended to specifically clarify their status under these provisions.

- There is a need to review whether the requirement that a lobbyist must always be in the physical presence of an official in order to be required to register should be retained in the Law.

- The provisions for confidentiality in the Ethics Law should be reviewed to determine if they adequately protect privacy without denying needed information to operations agencies or the public.

EMPLOYER SPENDING \$25,000 OR MORE - ALL REGISTRANTS -- ALL TYPES OF EXPENSES

November 1, 1990 - October 31, 1991

<u>TOTAL AMOUNT</u>	<u>EMPLOYER</u>
1. \$319,361.90	Health Facilities Association of Maryland
2. 311,590.30	Maryland Bankers Association
3. 200,686.90	Medical & Chirurgical Faculty of Maryland
4. 190,010.52	Citibank (MD), N.A. T/A Choice
5. **173,523.75	Maryland Jockey Club
6. 157,568.26	State Farm Insurance
7. 157,528.80	Maryland Chamber of Commerce
8. 157,403.34	GTECH Corporation
9. 132,698.62	Maryland State Teachers Association
10. 127,468.65	Maryland Retail Merchants Association
11. 127,464.13	Cable TV Assoc. of MD., DEL. & D.C.
12. 116,884.35	Maryland State Dental Association
13. 112,910.76	Associated Builders and Contractors
14. 110,823.85	C & P Telephone Company of Maryland
15. 105,937.82	Common Cause/Maryland
16. 105,590.47	Maryland Trial Lawyers Association
17. 102,607.48	Maryland Classified Employees Association
18. 101,037.00	Blue Cross & Blue Shield of Maryland
19. 93,143.84	Potomac Electric Power Company
20. 90,811.23	Johns Hopkins Health System
21. 86,484.30	Chemical Industry Council of Maryland
22. 85,689.52	Merrill, Lynch, Pierce, Fenner & Smith, Inc
23. 82,853.95	Maryland State Bar Association

**(Includes Race Track Passes of \$105,950.00)

24.	79,958.35	Maryland Medical Laboratory, Inc.
25.	73,954.39	Bethesda Chevy Chase Chamber of Commerce
26.	69,642.91	Maryland State & D.C. AFL-CIO
27.	68,939.51	Motorola, Inc.
28.	67,724.97	Maryland Builders Association
29.	66,028.40	Nat'L Federation of Independent Businesses
30.	64,944.15	Maryland Citizen Action Coalition
31.	64,269.06	First National Bank of Maryland
32.	63,639.14	Nationwide Insurance Company
33.	62,524.95	Household International
34.	62,284.44	Tobacco Institute
35.	62,003.13	Baltimore Gas & Electric Company
36.	61,603.94	Maryland Farm Bureau, Inc.
37.	61,055.35	Bethlehem Steel Corporation
38.	60,382.54	Maryland State & D.C. Building & Construction Trades Council
39.	60,055.86	Potomac Edison Company, Inc.
40.	59,177.13	Maryland Podiatric Medical Association
41.	58,971.65	Marine Spill Response Corporation
42.	58,715.62	Control Data
43.	58,694.21	Crown Central Petroleum
44.	58,430.25	Apartment & Office Building Association
45.	57,368.00	Geico Corporation
46.	56,970.42	Maryland Association of Chain Drug Stores
47.	56,167.00	A T & T
48.	55,823.00	Maryland Hospital Association

49.	55,394.56	Health Insurance Association of America
50.	54,746.41	ATANCA (Automotive Trade Association of the National Capital Area)
51.	54,461.73	Maryland Highway Contractors Association
52.	54,376.20	Association of Maryland Health Maintenance Organization
53.	53,843.44	Maryland Association of Realtors
54.	53,538.87	Qualified Universal Accumulation and Disbursement System (QUADS)
55.	53,060.35	McNeil Pharmaceuticals
56.	52,779.25	Marylanders for Efficient & Safe Highways
57.	52,762.84	Maryland Association of Mutual Insurance Companies (MAMIC)
58.	52,366.24	Association of Maryland Pilots
59.	51,600.56	American Insurance Association
60.	51,200.00	Committee for Fair Statues of Repose in Md
61.	48,068.39	Citizens for Local Planning
62.	47,561.49	CSX Transportation
63.	47,474.95	Enviro-Gro Technologies
64.	46,740.97	R. J. Reynolds Tobacco Company
65.	46,722.60	Systems Control, Inc.
66.	46,639.07	Rouse Company, Inc.
67.	46,256.89	MCI Telecommunications
68.	45,894.00	IBM Corporation
69.	45,194.49	P.I.E. Mutual Insurance Company
70.	45,000.00	Maryland General Hospital
71.	44,805.31	Glaxo, Inc.
72.	44,714.00	Maryland Independent College and University Association

73.	44,234.01	MED Mutual
74.	44,184.52	National Assn. of Independent Insurers
75.	44,069.00	Planned Parenthood of Maryland
76.	44,028.69	MD NARAL - MD. Affiliate of the National Abortion Rights Action League
77.	43,532.02	FMC Agricultural Chemicals
78.	43,473.28	Chambers Development Co. Inc.
79.	42,916.01	Pharmaceutical Manufacturers Association
80.	42,582.73	Variable Annuity Life Insurance
81.	42,415.00	Maryland Food Committee
82.	41,550.00	Marine Trades Association of Maryland
83.	41,548.90	Kaiser Foundation Health Plan of Mid-Atlantic States
84.	41,405.00	Town of Capitol Heights, Maryland
85.	40,784.88	American Petroleum Institute
86.	40,517.09	Healthplus
87.	40,175.00	Giant Food, Inc.
88.	40,105.29	Baltimore Bank Corporation
89.	40,017.16	Maryland New Car and Truck Dealers Assn.
90.	40,015.23	Maryland Land Title Association
91.	39,763.93	Columbia Country Club
92.	39,580.89	Maryland Psychological Association
93.	39,225.71	Baltimore County, Maryland
94.	38,471.56	Maryland Natural Gas
95.	38,134.63	Colonial Pipeline Company
96.	37,295.13	Blue Cross & Blue Shield of the National Capital Area

97.	37,225.26	Genstar Stone Products Company
98.	36,966.45	Medical Mutual Liability Insurance Society of Maryland
99.	36,898.78	Pfizer, Inc.
100.	36,697.00	Maryland Catholic Conference
101.	36,485.46	Chesapeake Bay Foundation
102.	36,371.90	Philip Morris, U.S.A.
103.	36,172.07	UNISYS Corporation
104.	35,666.74	National Association of Industrial & Office Parks, Md.
105.	35,494.59	Maryland Saltwater Sportfisherman's Assn.
106.	34,589.00	G. D. Searle & Company
107.	34,523.80	Baltimore Medical System, Inc.
108.	34,500.00	Eastern Shore of Md. Education Consortium
109.	33,366.86	Maryland Insurance Council
110.	33,233.32	Maryland Cab Association
111.	33,120.00	International Union of Operating Engineers
112.	32,780.25	National Right to Life
113.	32,452.13	Mid-Atlantic Food Dealers Association
114.	32,000.00	Committee of Maryland Domiciled Insurers
115.	31,921.84	Maryland Media Conference
116.	31,172.07	The Ryland Group
117.	30,989.82	National Solid Waste Management Assn.
118.	30,859.02	Professional Insurance Agents of PA., MD., and DEL, Inc.
119.	30,479.62	Highway Users Federation
120.	30,036.08	Montgomery County Association of Realtors
121.	29,940.14	Johns Hopkins University

122.	29,923.38	Baltimore Jewish Council
123.	29,717.42	Federation of Maryland Teachers
124.	29,701.57	Industry Council for Tangible Assets
125.	29,575.65	Property Owners Assn. of Greater Baltimore
126.	29,478.75	Joseph E. Seagram & Sons, Inc.
127.	29,297.36	Maryland Motor Truck Association, Inc.
128.	28,830.22	Howard County Economic Forum
129.	28,277.07	American Family Life Assurance Company
130.	27,983.77	Restaurant Association of Maryland, Inc.
131.	27,957.06	Mid-Atlantic Coca Cola
132.	27,836.00	DEL/MD Synod, Evangelical Lutheran Church
133.	27,594.86	Maryland Association of Certified Public Accountants
134.	27,534.01	Maryland Nature Conservancy, Inc.
135.	27,525.27	Maryland Mental Health & Addictions Care Care Association, Inc.
136.	27,304.85	Discovery Channel
137.	27,265.42	Wheat, First Securities, Inc.
138.	27,224.37	Maryland Society of the American Institute of Architects, Inc.
139.	26,866.20	Maryland Assn. of Boards of Education
140.	26,657.50	Marriott Corporation
141.	26,349.71	Maryland Science Center
142.	26,342.89	Merck, Sharp & Dohme
143.	26,317.12	Westvaco Corporation
144.	26,161.15	Fraternal Order of Police, Md.State Lodge
145.	25,891.89	American Lung Association of Maryland

146.	25,398.39	Marylander's for the Right to Choose
147.	25,326.32	Alamo-Rent-A Car, Inc.
148.	25,250.00	Maryland Manufactured Housing Association
149.	25,151.53	Maryland Social Work Coalition
150.	25,043.71	Handgun Control, Inc.
151.	25,000.00	Monumental Life Insurance Company

LOBBYISTS RECEIVING \$50,000 OR MORE IN COMPENSATION - ALL CLIENTS

November 1, 1990 - October 31, 1991

1.	\$710,020.00	Bereano, Bruce, C.
2.	559,974.50	Rifkin, Alan, M.
3.	426,021.75	Goldstein, Franklin
4.	388,010.50	Cooke, Ira, C.
5.	368,691.00	Evans, Gerard, E.
6.	309,332.21	McCoy, Dennis, C.
7.	283,400.00	Doyle, James, J., Jr.
8.	281,950.00	Schwartz, Joseph, A. III
9.	240,470.00	Pitcher, J. William
10.	208,445.00	Manis, George, N.
11.	168,338.12	Neil, John, B.
12.	162,065.08	Doherty, Daniel, T.
13.	153,685.90	Enten, D. Robert
14.	129,249.22	Barbera, Thomas, P.
15.	128,787.50	Burridge, Carolyn, T.
16.	123,214.50	Goeden, James, P.
17.	114,635.25	Tiburzi, Paul, A.
18.	109,992.50	Doolan, Devin John
19.	100,901.30	Shaivitz, Robin, F.
20.	96,025.54	Adler, Maxine
21.	95,416.65	O'Dell, Wayne
22.	94,303.66	Davis, Michael, H.
23.	92,400.00	Canning, Michael, F.
24.	83,750.00	Neily, Alice, J.
25.	77,442.00	Rummage, Frederick, C.

26.	75,750.00	Miller, Herman, B.
27.	68,300.00	Chew, Fred, D.
28.	67,950.00	Popham, Bryson, F.
29.	62,028.50	Silver, Edgar, P.
30.	56,500.00	Buckingham, Stephen
31.	55,694.28	Winchester, Albert, III
32.	55,659.56	Steward, William, R.
33.	55,120.00	Epstein, Harvey, A.
34.	53,549.99	Bowers, John, B., Jr.

11

11